

SEALED

FILED

JUL 29 2020

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

**MICHAEL ALMENDAREZ (1),
BLAKE OGG (2),
LUIS RAMOS (3),
THOMAS MCDAVID (4),**

Defendants,

**▶ COUNT 1: 21 U.S.C §§ 846, 841(a)(1)
and 841(b)(1)(A) Conspiracy to Possess
with Intent to Distribute 50 grams or
more of Methamphetamine;**

**▶ COUNT 2: 21 U.S.C §§ 841(a)(1),
841(b)(1)(A) & 18 U.S.C § 2, Possession
with the Intent to Distribute 50 grams
or more of Methamphetamine, Aiding
and Abetting;**

**▶ COUNT 3: 18 U.S.C. § 922(g)
Possession of a Firearm by a Convicted
Felon;**

**▶ COUNTS 4-5: 18 U.S.C. § 924(c)
Possession of a Firearm in Furtherance
of a Drug Trafficking Offense]**

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)]

That on or about July 7, 2020, in the Western District of Texas, Defendants,

**MICHAEL ALMENDAREZ (1),
BLAKE OGG (2),
LUIS RAMOS (3),
THOMAS MCDAVID (4),**

and others unknown to the Grand Jury, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together and with each other to distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine (Actual), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A).

COUNT TWO

171 U.S.C. §§ 841(a)(1) & 841(b)(1)(A) and 18 U.S.C. § 21

That on or about July 7, 2020, in the Western District of Texas, Defendants,

**MICHAEL ALMENDAREZ (1),
BLAKE OGG (2),
LUIS RAMOS (3),
THOMAS MCDAVID (4),**

did unlawfully, knowingly and intentionally aid and abet each other to possess with intent to distribute a controlled substance, which offense involved 50 grams or more of Methamphetamine (Actual), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A) , and Title 18 United States Code Section 2.

COUNT THREE

[18 U.S.C. § 922(g)]

On or about July 7, 2020, in the Western District of Texas, Defendant,

MICHAEL ALMENDAREZ (1),

having been convicted of a crime punishable by imprisonment for a term exceeding one year did knowingly possess in and affecting commerce a firearm, to wit: a Smith and Wesson Model SD40VE handgun , Serial Number FCB3712 , which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g) and 924(a)(2).

COUNT FOUR

[18 U.S.C. § 924(c)]

That on or about July 7, 2020, in the Western District of Texas, Defendant,

MICHAEL ALMENDAREZ (1).

did knowingly carry and use a firearm, to wit: a Smith and Wesson Model SD40VE handgun , Serial Number FCB3712, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is Conspiracy to Possess and Possession with I intent to Distribute 50 grams or more of Methamphetamine in violation of Title 21 United States Code Sections 846 and 841(a)(1) as alleged in Counts One and Two of this indictment, in violation of Title 18, United States Code, Sections 924(c).

COUNT FIVE
[18 U.S.C. § 924(c)]

That on or about July 7, 2020, in the Western District of Texas, Defendant,

LUIS RAMOS (3),

did knowingly carry and use a firearm, to wit: a Sig Sauer Model P365 handgun , Serial Number 66A707727, during and in relation to, and did possess said firearm in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is Conspiracy to Possess and Possession with I intent to Distribute 50 grams or more of

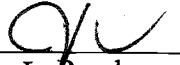
Methamphetamine in violation of Title 21 United States Code Sections 846 and 841(a)(1) as alleged in Counts One and Two of this indictment, in violation of Title 18, United States Code, Sections 924(c).

A TRUE BILL,


FOREPERSON OF GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

By:

 Sor:
Sam L. Ponder
Assistant United States Attorney